

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CONVERGED COMPLIANCE SOLUTIONS,
INC.,

CIVIL ACTION NO.:
1:21-cv-05482

Plaintiff,

Hon. Paul G. Gardephe

-against-

AFFIDAVIT IN SUPPORT

XOP NETWORKS, INC, XOP NETWORKS
LATVIA, SIA, SUDHIR GUPTA and DAVID
HARDING,

Defendants.

STATE OF NEW YORK }

COUNTY OF QUEENS } ss:

Terence McDonough, an adult individual and resident of the State of New York, being duly sworn,
hereby deposes and states that the following is true under penalties of perjury:

1. That I am a principle of the plaintiff in the above matter, and as such, I am fully
familiar with the facts and circumstances herein.

2. I have personally reviewed Defendants' motion to dismiss filed in this action and I
am familiar with its contents.

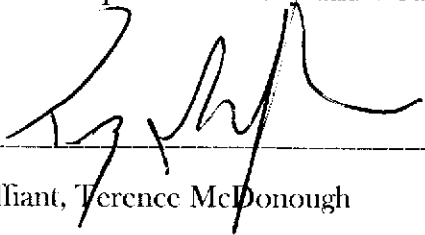
3. I have been employed by IPC and BT and am intimately familiar with trading voice
systems and the Trader Voice networks required for voice trading.

4. IPC may possess the institutional Trader Voice knowledge needed to succeed in
that sector but relied on their legacy network services business to maintain existing revenue until

the market forced them to provide a service that included the XOP USN for the evolution of their Trader Voice network.

5. Accordingly, IPC would not have transferred the Trader Voice knowledge necessary to succeed in that sector to Defendants without jeopardizing their existing TDM private wire revenue.

6. If called as a witness, I am competent to testify and would testify to the facts set out above.


Alliant, Terence McDonough

STATE OF NEW YORK

COUNTY OF QUEENS

On the 5th day of November, in the year 2021, before me came Terence McDonough, personally known to me or proved to me on the basis of satisfactory evidence to be the individual whose name is subscribed to the within instrument and she acknowledged to me that she signed the within instrument, is fully familiar with its contents and that the contents are true and correct to the best of her knowledge.

ANGELIKI SPATORCIO
NOTARY PUBLIC-STATE OF NEW YORK
No. 01SP6411069

Qualified in Queens County

My Commission Expires 11-09-2024

Notary Public Signature



Commission Expires: 11.09.2024